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CLERK U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2007 OCT -1 AM 10:45

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al.,                     )  
   )  
Plaintiffs,   )  
   )  
v.   ) Civil Action No. 05-823-\*\*\* (MPT)  
   )  
STANLEY TAYLOR, et al.,                     )  
   )  
Defendants.   )

**CERTIFICATION**

At Wilmington this 1<sup>st</sup> day of October, 2007;

I, Nancy Rebeschini, Esquire, pro se law clerk, and designated officer for depositions upon written questions held before me on September 26, 2007, do here by certify that:

1. The deposition of Joseph Adkins was held on September 26, 2007, at the J. Caleb Boggs Federal Building, Wilmington, Delaware.

2. On that same date, Joseph Adkins declared before me, an individual authorized to administer oaths, that his written answers were true and correct.

3. I read aloud each and every deposition question submitted by plaintiff, George A. Jackson, for deponent, Joseph Adkins.

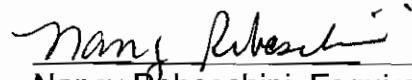
4. I personally observed deponent, Joseph Adkins, answer in writing, the deposition questions.

5. A true and correct copy of the written questions filed by plaintiff, the original written answers of deponent, and written original objections made by his counsel are attached hereto and are filed with the court, and copies shall be served upon the parties

and the deponents.

I, Nancy Rebeschini, certify under penalty of perjury that the foregoing is true and correct.

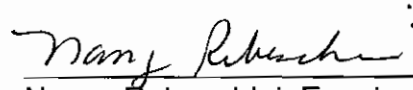
Executed this 1<sup>st</sup> day of October, 2007.

  
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Nancy Rebeschini, Esquire, Designated  
Officer

CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2007, I caused to be electronically filed the attached Certification with the Clerk of the Court using CM/ECF, which will send notification of such filing to Eileen Kelly, Esquire, counsel for defendants. I further certify I caused a true and correct copy of the attached Certification to be served via U.S. mail on plaintiffs: George A. Jackson, SBI No. 171250, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Darus Young, SBI No. 282852, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Charles Blizzard, SBI No. 166670, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Frank Williams, SBI No. 261867, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Roy R. Williamson, SBI No. 291856, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Anthony Morris, SBI No. 300363, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Carl Walker, SBI No. 173378, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Samuel Jones, SBI No. 465297, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Darwin A. Savage, SBI No. 232561, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Adrain Wright, SBI NO. 169921, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Gilbert Williams, SBI No. 137575, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Charles B. Sanders, SBI No. 160428, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Joseph White, SBI No. 082985, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Timothy L. Malloy, SBI No. 171278, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Howard Parker,

SBI No. 165324, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Kevin Spivey, SBI No. 258693, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; James Johnson, SBI No. 155123, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Vernon Truitt, SBI No. 188191, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Roderick Brown, SBI No. 315954, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; José Serpa, SBI No. 350322, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Roger Thomas, SBI No. 292590, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; John F. Davis, SBI No. 263753, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Lawrence B. Dickens, SBI No. 124570, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Eldon Potts, SBI No. 211193, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Jerome Green, SBI No. 147772, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; and Rique Reynolds, SBI No. 266486, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947.

  
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Nancy Rebeschini, Esquire,  
Designated Officer

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al.,  
Plaintiffs,  
v.  
STANLEY TAYLOR, et al.,  
Defendants.

C.A. No. 05-823-\*\*\*

PLAINTIFF GEORGE A. JACKSON'S WRITTEN DEPOSITIONS  
TO DEPOSE DEFENDANT JOSEPH ADKINS

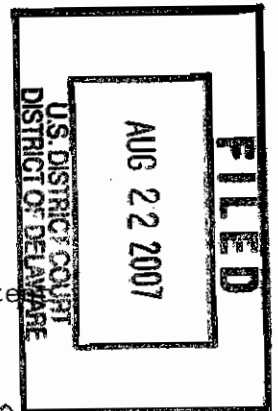
Plaintiff George A. Jackson, pro se, hereby depose defendant upon  
Order of the Court:

GENERAL OBJECTIONS

1. Plaintiff objects to the deposing of the defendants to the extent  
of written depositions. Just for the record.

WRITTEN DEPOSITIONS

1. How long have you been employed with the Delaware Department of  
Corrections?
2. Are you under the influence of any medication?
3. Have you had a chance to review the Amended Complaint, your "Response  
to Plaintiffs' Interrogatories", and any previous statements you given  
to defendants' counsel or any one else in connection with this case before  
coming here today?
4. Have you had a chance to meet and discuss the case with defendants'  
counsel?
5. Do you realize that you are under oath, just as if you were at  
trial testifying?
6. Is there any reason you can't give your best testimony today?



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7. State your job title, and explain your general duties.

8. On July 20, 2005, an inmate reportedly found a parasite (larva) in his Beef Cube Steak, in which you carried out the investigation which included an inspection of the kitchen area. After your findings, was any replacement vermin control equipment such as bug lights ordered for the kitchen area?

9. Did "Going Clean" Pressure Washing Company steam clean the exhaust hood system at the kitchen ~~before~~ before the filing of George A. Jackson's July 19, 2005 grievance, or after the filing of this December 1, 2005, Civil Action Complaint?

10. Do you agree or disagree? When a person is working under conditions that exhibits excessive heat and high humidity, a persons body works at a much higher stress level due to the lack of oxygen in the air?

11. Since you have worked at the SCI main kitchen, when an inmate complain of any illness, does the SCI food service staff diagnose the inmate, or is he refer to the medical unit to be examined by the proper authorized personnel?

12. When inmate kitchen workers was housed in the air condition cool Merit building, if they refused to work or get fired, would that inmate received a major disciplinary report (class I), and immediately moved to a less desireable building.

13. Have you ever completed any accredited program on food safety, personal hygiene, preparation, cooking, proper cleaning and sanitizing before July 1, 2005? If yes, please state the name of the accredited program and the date of completion.

14. Are you aware there is only one (1) toilet seat for 22 to 25 inmate workers to use, which forces workers to wait long periods, or even relieving themselves in the floor drains located in the tray room area?

15. Have you ever recorded the air temperature on the "old" side kitchen area?

Joseph Atkins

9/26/07

- 1) 7 years 2 months
- 2) no
- 3) yes
- 4) yes
- 5) yes
- 6) no
- 7) Food Service Supervisor / Food Orders / supervising C/O staff / Grievances
- 8) No, Doc was closed by the USDO
- 9) I don't know
- 10) I don't know. I'm not a doctor.
- 11) referred to medical
- 12) The inmate would be written upon the proper charge by the Food Service Staff. Then the decision to move the inmate would be made by Classification
- 13) Serve-Safe approximately 2001
- 14) I know that there is only 1 toilet. I do not know of any inmates relieving themselves in the floor drains.
- 15) NO





Joseph Atkins 9/26/07

Eileen Kelly, Esq., DAB

3. Objection.

4. Objection. Instruct witness not to provide any ~~in any~~ information concerning discussion with me (Eileen Kelly) or Catherine Damavandi.

Eileen Kelly 9/26/07